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*Attorneys for WHATFIX, INC. and
WHATFIX PRIVATE LIMITED*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

WALKME LTD., an Israeli company, and
WALKME INC., a Delaware corporation,

Plaintiffs,

v.

WHATFIX, INC., a Delaware corporation, and
WHATFIX PRIVATE LIMITED, an Indian
company,

Defendants.

WHATFIX, INC., a Delaware corporation, and
WHATFIX PRIVATE LIMITED, an Indian
company,

Counter-claimants,

v.

WALKME LTD., an Israeli company, and
WALKME INC., a Delaware corporation

Counter-defendants.

Case No. 4:23-cv-03991-JSW

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL WITH
PREJUDICE**

1 The parties to this action, acting through counsel, and pursuant to Federal Rule of Civil
2 Procedure 41(a)(1)(A)(ii) hereby stipulate to the dismissal with prejudice of this action. All claims
3 and counterclaims now or ever pending in the action are hereby DISMISSED WITH PREJUDICE,
4 without any right of appeal, with each side to bear its own attorney's fees and costs.

5
6 Dated: May 6, 2025

Respectfully submitted,

8 By: /s/ Daniel Zaheer
9 Daniel Zaheer
KOBRE & KIM LLP

10 *Attorneys for*
11 WALKME LTD. AND WALKME INC.

12
13 By: /s/ Roman A. Swoopes
14 Roman A. Swoopes
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15 *Attorneys for*
16 WHATFIX, INC. and
WHATFIX PRIVATE LIMITED

17
18 **ECF ATTESTATION**

19 I, Daniel Zaheer, hereby attest pursuant to Civil Local Rule 5-1(i)(3) that the
20 concurrence to the filing of this document has been obtained from each signatory hereto.


21
22 By: /s/ Daniel Zaheer
23 Daniel Zaheer
KOBRE & KIM LLP

24 *Attorneys for*
25 WALKME LTD. AND WALKME INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall close this file.

Dated: May 7, 2025


HON. JEFFREY S. WHITE
United States District Judge